

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|----------------------------|---|----------------------|
| GEORGE A. JACKSON, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | C. A. No. 05-823-*** |
| |) | |
| STANLEY TAYLOR, et al., |) | JURY TRIAL REQUESTED |
| |) | |
| Defendants. |) | |

**DEFENDANTS STAN TAYLOR, JOYCE TALLEY AND CARL ANSON’S MOTION
FOR ENLARGEMENT OF TIME OUT OF TIME PURSUANT
TO FED. R. CIV. P. 6(b)(2) TO RESPOND TO PLAINTIFFS’
REQUESTS FOR ADMISSIONS**

1. The Plaintiffs are inmates incarcerated and under the supervision of the Delaware Department of Correction (“DOC”) mainly housed at the Sussex Correctional Institution (“SCI”) in Georgetown, Delaware but also at the Delaware Correctional Center and the Morris Community Corrections Institution.

2. On or about December 1, 2005, the inmate Plaintiffs under the direction of Plaintiff George Jackson, (“Jackson”) commenced this action by filing a Complaint pursuant to 42 U.S.C. §1983 with leave to proceed *in forma pauperis* alleging Eighth and Fourteenth Amendment Due Process violations against the following defendants: Stan Taylor, Joyce Talley and Carl Anson. (D.I. 2). On or about October 10, 2006, Jackson filed a Motion to Amend the Complaint to add the following DOC Defendants: Michael Knight, Chris Senato, Bethany Evans, Debbie Melvin, Richard Crockett, Richard Manuel, Wentson White and Steven Rayner. (D.I. 117).

3. Jackson has filed several discovery requests one of which was a *Request for Admissions* directed to Defendants Stan Taylor, Joyce Talley and Carl Anson on or about November 6, 2007. (D.I. 220).

4. Due to the press of other litigation counsel was not able to file Defendants' Response to the *Request for Admissions* in a timely manner. Additionally, two of the Defendants, Stan Taylor and Carl Anson have retired making contact with them at times tedious if not difficult. In order to properly respond to Jackson's request, counsel for Defendants requests an enlargement of thirty (30) days from the December 6, 2007, deadline for filing a response until on or before January 6, 2008.

5. This is Defendants Taylor, Talley and Anson's first request for an extension of time for filing a Response to Jackson's *Request for Admissions*.

6. There is no trial date scheduled in this case.

7. A form of order is attached to this motion that will grant the Defendants a thirty (30) day extension from the December 6, 2007, deadline until January 6, 2008, in which to file Defendants' response.

WHEREFORE, the Defendants respectfully request that this Honorable Court grant their Motion and enter an Order, substantially in the form attached hereto, enlarging Defendants' time.

**DEPARTMENT OF JUSTICE
STATE OF DELAWARE**

/s/ Catherine Damavandi
Catherine Damavandi, ID #3823
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(302)577-8400
Attorney for Defendants

Dated: December 13, 2007

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| Defendants. |) | |

7.1.1 CERTIFICATION OF COUNSEL

The counsel for the Defendants, Deputy Attorney General Catherine Damavandi, files this certification in compliance with Rule 7.1.1 of the Local Rules of Civil Procedure and certifies that:

1. Plaintiffs are inmates incarcerated in the Delaware Correctional system, at the Sussex Correctional Institution and the Delaware Correctional Center.
2. Since the Plaintiffs are not able to be reached by telephone counsel for the Defendants has spent no time in attempting to reach an agreement on the subject of the motion for enlargement of time.
3. She assumes the motion is opposed.

DEPARTMENT OF JUSTICE
STATE OF DELAWARE

/s/ Catherine Damavandi
Catherine Damavandi, ID #3823
Deputy Attorney General
820 N. French St. 6th Fl.,
Wilmington, De 19801
(302)577-8400
Attorney for Defendants

Dated: December 13, 2007

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2007, I electronically filed the attached *Defendants Stan Taylor, Joyce Talley and Carl Anson's Enlargement of Time Out of Time To Respond to Plaintiffs' Request for Admissions* with the Clerk of Court using CM/ECF. I hereby certify that on December 13, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi
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